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*Attorneys for specially appearing defendant  
Wolverine World Wide, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

MARIELITA PALACIOS, individually and on behalf of all others similarly situated,

**Plaintiff.**

v.

WOLVERINE WORLD WIDE, INC., a  
Delaware company d/b/a/  
WWW.ONLINESHOES.COM.

## Defendant.

CASE NO. 2:24-cv-00288-WLH-SSC

Assigned to Hon. Wesley L. Hsu

**STIPULATION TO CONTINUE THE  
RULE 26(f) SCHEDULING  
CONFERENCE AND RELATED  
DEADLINES**

[Declaration of Rebekah S. Guyon;  
Proposed Order filed concurrently]

Action Filed: Dec. 4, 2023  
Action Removed: Jan. 11, 2024

1 Pursuant to Local Rules 7-1 and 7-3, Plaintiff Marielita Palacios (“Plaintiff”) and  
2 Defendant Wolverine World Wide, Inc. (“Defendant” or “Wolverine”) hereby stipulate to  
3 continue the Rule 26(f) Scheduling Conference.

4 The parties, by and through their respective counsel, stipulate and agree as follows:

5 WHEREAS, Plaintiff filed her Complaint in the Superior Court of Los Angeles for  
6 the State of California on December 4, 2023, which Defendant removed on January 11,  
7 2024 (Dkt. No. 1);

8 WHEREAS, after Defendant moved to dismiss the Complaint on January 18, 2024  
9 (Dkt. No. 8), Plaintiff amended her pleading and filed the First Amended Complaint  
10 (“FAC”) on January 25, 2024 (Dkt. No. 10);

11 WHEREAS, on February 8, 2024 Defendant filed its Motion to Dismiss the First  
12 Amended Complaint (Dkt. No. 13) (“Motion”) which is fully dispositive of all claims  
13 alleged in the FAC, and the hearing on the Motion is set for March 15, 2024;

14 WHEREAS, briefing on the Motion is complete;

15 WHEREAS, on February 12, 2024, this Court set the Rule 26(f) Scheduling  
16 Conference for March 29, 2024 at 1:00 p.m. (Dkt. No. 16);

17 WHEREAS, lead counsel for Defendant, Rebekah S. Guyon, is also counsel of  
18 record for 23andMe, Inc., in a putative multidistrict litigation (“MDL”), *In re 23andMe,*  
19 *Inc., Customer Data Security Breach*, MDL No. 3098, in which the Judicial Panel on  
20 Multidistrict Litigation (“JPML Panel”) only scheduled a hearing on February 16, 2024 for  
21 23andMe’s MDL petition, even though 23andMe moved for MDL consolidation and  
22 transfer on December 21, 2023. The JPML Panel set the MDL hearing for March 28, 2024,  
23 in person in Charleston, South Carolina;

24 WHEREAS, it is uncertain whether Lead Counsel for Defendant will be able to  
25 return to Los Angeles in time for the Rule 26(f) Scheduling Conference on March 29, 2024,  
26 because there are no non-stop flights from Charleston to Los Angeles, and it is unclear how  
27 long oral argument will last before the JPML on March 28, as MDL No. 3098 is not the  
28 only matter set for oral argument before the JPML Panel on that date;

WHEREAS, in light of the apparently conflicting JPML hearing set for March 28, and the fully-dispositive nature of Defendant's motion to dismiss, counsel for the parties have met and conferred and agreed to stipulate to a continuance of the Rule 26(f) Scheduling Conference and all deadlines related thereto, subject to the Court's approval, until twenty-one (21) days after the Court rules on Defendant's motion to dismiss;

WHEREAS, the stipulated continuance will not impact any other dates set by the Court.

NOW THEREFORE, PLAINTIFF AND DEFENDANT HEREBY STIPULATE that the Rule 26(f) Scheduling Conference shall be continued to a date twenty-one (21) days after this Court's ruling on the Motion, with all deadlines related to the Rule 26(f) Scheduling Conference continued accordingly.

## **IT IS SO STIPULATED.**

DATED: March 8, 2024

GREENBERG TRAURIG, LLP

By /s/ Rebekah S. Guyon  
Rebekah S. Guyon

Attorneys for Defendant  
**WOLVERINE WORLD WIDE, INC.**

DATED: March 8, 2024

## PACIFIC TRIAL ATTORNEYS APC

By /s/ Scott J. Ferrell  
Scott J. Ferrell

Attorneys for Plaintiff  
**MARIELITA PALACIOS**

## **ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Rebekah S. Guyon, hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: March 8, 2024

## GREENBERG TRAURIG, LLP

By /s/ Rebekah S. Guyon  
Rebekah S. Guyon